

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS TEACHER RETIREMENT  
SYSTEM,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
ALLIANZ GLOBAL INVESTORS U.S.  
HOLDINGS LLC, ALLIANZ SE, ALLIANZ  
ASSET MANAGEMENT GMBH, ALLIANZ OF  
AMERICA, INC., ALLIANZ ASSET  
MANAGEMENT OF AMERICA HOLDINGS  
INC., ALLIANZ ASSET MANAGEMENT OF  
AMERICA LLC, ALLIANZ ASSET  
MANAGEMENT OF AMERICA LP, AND PFP  
HOLDINGS INC.,

Defendants.

Case No. 1:20-cv-5615-KPF

(caption continues on following  
pages)

**STIPULATION AND [PROPOSED] CIVIL CASE MANAGEMENT PLAN #4**

RETIREMENT PROGRAM FOR EMPLOYEES OF THE TOWN OF FAIRFIELD, <i>et al.</i> ,  Plaintiffs,  v.  ALLIANZ GLOBAL INVESTORS U.S. LLC, <i>et al.</i> ,  Defendants.	No. 20 Civ. 5817 (KPF)
LEHIGH UNIVERSITY,  Plaintiff,  v.  ALLIANZ GLOBAL INVESTORS U.S. LLC, <i>et al.</i> ,  Defendants.	No. 20 Civ. 7061 (KPF)
TEAMSTER MEMBERS RETIREMENT PLAN, <i>et al.</i> ,  Plaintiffs,  v.  ALLIANZ GLOBAL INVESTORS U.S. LLC, <i>et al.</i> ,  Defendants.	No. 20 Civ. 7154 (KPF)
BLUE CROSS AND BLUE SHIELD ASSOCIATION NATIONAL EMPLOYEE BENEFITS COMMITTEE,  Plaintiff,  v.  ALLIANZ GLOBAL INVESTORS U.S. LLC, <i>et al.</i> ,  Defendants.	No. 20 Civ. 7606 (KPF)
METROPOLITAN TRANSPORTATION AUTHORITY DEFINED BENEFIT PENSION PLAN MASTER TRUST, <i>et al.</i> ,  Plaintiffs,  v.  ALLIANZ GLOBAL INVESTORS U.S. LLC, <i>et al.</i> ,  Defendants.	No. 20 Civ. 7842 (KPF)

CHICAGO AREA I.B. OF T. PENSION PLAN &  
TRUST, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
*et al.*,

Defendants.

No. 20 Civ. 7952 (KPF)

THE EMPLOYES' RETIREMENT SYSTEM OF THE  
CITY OF MILWAUKEE,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 8642 (KPF)

CHICAGO & VICINITY LABORERS DISTRICT  
COUNCIL PENSION FUND AND CHICAGO &  
VICINITY LABORERS DISTRICT COUNCIL  
HEALTH & WELFARE FUND, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9478 (KPF)

THE BOARDS OF TRUSTEES FOR THE  
CARPENTERS HEALTH AND SECURITY TRUST  
OF WESTERN WASHINGTON AND FOR THE  
GROUP INVESTMENT TRUST OF THE  
CARPENTERS INDIVIDUAL ACCOUNT PENSION  
TRUST OF WESTERN WASHINGTON, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9479 (KPF)

UNITED FOOD & COMMERCIAL WORKERS  
UNIONS & EMPLOYERS MIDWEST PENSION  
FUND, AND ITS TRUSTEES,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9587 (KPF)

BOARD OF TRUSTEES OF THE INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,  
LOCAL NO. 38 PENSION FUND PENSION PLAN,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 10028 (KPF)

BLUE CROSS AND BLUE SHIELD ASSOCIATION,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

Defendant.

No. 20 Civ. 10848 (KPF)

MARCO CONSULTING GROUP TRUST I, by and  
through its directed trustee, The Bank of New York  
Mellon,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 21 Civ. 401 (KPF)

UNIVERSITY HEALTH, INC., SOUTHEAST  
GEORGIA HEALTH SYSTEM, INC., UNIVERSITY  
MEDICAL ASSOCIATES OF THE MEDICAL  
UNIVERSITY OF SOUTH CAROLINA (D/B/A  
MUSC PHYSICIANS), VIZIENT SOUTHERN  
STATES, INC., PHOENIX HEALTH CARE  
MANAGEMENT SERVICES, INC., AND HALIFAX  
REGIONAL MEDICAL CENTER EMPLOYEES'  
PENSION PLAN,

Plaintiffs,

V.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
ALLIANZ GLOBAL INVESTORS DISTRIBUTORS  
LLC, AND ALLIANZ SE,

Defendants.

No. 21 Civ. 1485 (KPF)

ALASKA LABORERS-EMPLOYERS RETIREMENT  
FUND, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 21 Civ. 1879 (KPF)

RAYTHEON TECHNOLOGIES CORPORATION  
PENSION ADMINISTRATION AND INVESTMENT  
COMMITTEE,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

Defendant.

No. 21 Civ. 3116 (KPF)

FINANCE COMMITTEE OF THE BOARD OF  
DIRECTORS OF BLUE CROSS BLUE SHIELD OF  
MICHIGAN and BLUE CROSS BLUE SHIELD OF  
MICHIGAN FOUNDATION,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

No. 21 Civ. 3276 (KPF)

Defendant.	
<p>TEXAS TREASURY SAFEKEEPING TRUST COMPANY,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC, ALLIANZ GLOBAL INVESTORS U.S. HOLDINGS LLC, ALLIANZ SE, ALLIANZ ASSET MANAGEMENT GMBH, ALLIANZ OF AMERICA, INC., ALLIANZ ASSET MANAGEMENT OF AMERICA HOLDINGS INC., ALLIANZ ASSET MANAGEMENT OF AMERICA LLC, ALLIANZ ASSET MANAGEMENT OF AMERICA LP, and PFP HOLDINGS INC.,</p> <p>Defendants.</p>	No. 21 Civ. 6074 (KPF)
<p>CHRISTIAN BROTHERS EMPLOYEE RETIREMENT PLAN, and DAN STREMEL, in his capacity as Chairperson of the Pension Board,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC, ALLIANZ GLOBAL INVESTORS U.S. HOLDINGS LLC, ALLIANZ SE, ALLIANZ ASSET MANAGEMENT GMBH, ALLIANZ OF AMERICA, INC., ALLIANZ ASSET MANAGEMENT OF AMERICA HOLDINGS INC., ALLIANZ ASSET MANAGEMENT OF AMERICA LLC, ALLIANZ ASSET MANAGEMENT OF AMERICA LP, AND PFP HOLDINGS INC.,</p> <p>Defendants.</p>	No. 21 Civ. 7388 (KPF)
<p>BOARD OF TRUSTEES OF THE SAN DIEGO COUNTY CONSTRUCTION LABORERS' PENSION TRUST FUND,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC,</p> <p>Defendant.</p>	No. 21 Civ. 7898 (KPF)

The parties (“Parties”) to the above-referenced actions (the “Related Actions”) by and through their respective undersigned counsel, and subject to this Court’s approval, agree and stipulate as follows:

WHEREAS, on December 7, 2020, the Court entered Civil Case Management Plan #1 in *Arkansas Teacher Retirement System v. Allianz Global Investors US LLC et al.*, No. 20-cv-05615 (“ATRS Action”), ECF No. 65 (“Plan #1”), and certain other Related Actions;

WHEREAS, on November 1, 2021, the Court entered Civil Case Management Plan #2 in the Related Actions, *see, e.g.*, ATRS Action, ECF No. 108 (“Plan #2”);

WHEREAS, on December 20, 2021, the Court entered Civil Case Management Plan #3 in the Related Actions, *see, e.g.*, ATRS Action, ECF No. 112 (“Plan #3”);

WHEREAS, Plans #2 and #3 set forth a schedule for the filing of amended complaints, any further motions to dismiss, and responsive pleadings in the Related Actions, and Plan #1 otherwise remained in effect; and

WHEREAS, the Parties have agreed to extend certain deadlines under Plan #3,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties as follows:

1. Plan #3 is amended and superseded as follows:

## **[PROPOSED] CIVIL CASE MANAGEMENT PLAN #4**

This Civil Case Management Plan (“Plan #4”) is submitted by the parties in each of the above-captioned related cases (together, the “Related Actions”) in accordance with the Court’s September 30, 2021 order and the October 30, 2021 Joint Status Report.

Plan #4 supplements Civil Case Management Plan #1 (“Plan #1”) (1:20-cv-5615-KPF, ECF No. 65), Civil Case Management Plan #2 (1:20-cv-5615-KPF, ECF No. 108), and Civil Case Management Plan #3 (1:20-cv-5615-KPF, ECF No. 112), which remain operative except as provided for herein. Capitalized terms not defined herein have the meaning set forth in Plan #1.

### **7.3 Motions to Dismiss Later-Filed Related Actions and Amended Complaints.** Plan #3, ¶ 7.2 is vacated.

In those pending Related Actions filed after December 3, 2020 (“Later-Filed Related Actions”) that were not subject to AllianzGI US’s February 25, 2021 motion to dismiss (1:20-cv-5615-KPF, ECF No. 82) (“First-Round Motion to Dismiss”) decided by the Court on September 30, 2021 (1:20-cv-5615-KPF, ECF No. 106) (“September 30 Order”), AllianzGI US or Allianz Global Investors Distributors LLC (together, “AllianzGI Defendants”) informed Plaintiffs in writing of the grounds on which AllianzGI Defendants intend to move to dismiss, on November 22, 2021. To the extent no amended complaint is filed in any Later-Filed Related Action pursuant to Paragraph 8.3 and AllianzGI Defendants’ grounds for dismissal remain unchanged from their November 22, 2021 writing, the Court’s pre-motion letter practice for such Later-Filed Related Action is suspended.

Aon may file a motion to dismiss only if the complaint in BCBS (1:20-cv-7606-KPF) is amended to assert new claims against Aon. AllianzGI US may file a motion to dismiss in those Related Actions subject to the First-Round Motion to Dismiss only where the complaint is amended pursuant to Paragraph 8.3.

In the event Aon or AllianzGI Defendants intend to move to dismiss an amended complaint filed pursuant to Paragraph 8.3 or any complaint in a Later-Filed Related Action, the parties shall meet and confer no later than March 21, 2022 on (i) their respective positions on whether to propose suspending the Court’s pre-motion letter practice for motions to dismiss amended complaints; (ii) page limits; and (iii) the form of briefing, including approaches to coordinating motion practice to reduce the burden on the Court and the parties. The parties shall submit a joint report to the Court no later than March 31, 2022 with the parties’ agreements as to the topics addressed through their conferral, and, to the extent agreement is not reached, the parties’ joint report shall set out their areas of disagreement, not to exceed 5 pages double-spaced for Plaintiffs (collectively) and for each Defendant. The parties’ meet-and-confer obligation set out herein replaces any obligation in so-ordered stipulations in Later-Filed Related Actions to meet and confer regarding the application of the September 30 Order, AllianzGI Defendants’ intention to move to dismiss and/or a schedule for such motion for such Later-Filed Related Action.



**8.3 Amended Complaints.** Plan #3, ¶ 8.2 is vacated, except to the extent that it vacated ¶ 8 of Plan #1 and ¶ 8.1 of Plan #2. Any complaint in the Related Actions amended pursuant to the September 30 Order or any amended complaint in any Later-Filed Related Action, shall be filed on March 7, 2022. Amendments of the complaints in the Related Actions after March 7, 2022 shall be either with the opposing party's written consent or the Court's leave. Plaintiffs reserve their rights, if any, to amend under Fed. R. Civ. P. 15(a)(1).

**9.3 Answers.** Plan #3, ¶ 9.2 is vacated, except to the extent that it vacated ¶ 9 of Plan #1, as are any deadlines for Answers in so-ordered stipulations filed in any Related Action. The parties shall meet and confer no later than March 21, 2022 to set a deadline for Answers in all Related Actions.

Dated: February 18, 2022  
New York, NY

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SO ORDERED.

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KATHERINE POLK FAILLA  
United States District Judge

Dated: \_\_\_\_\_, 2022  
New York, New York